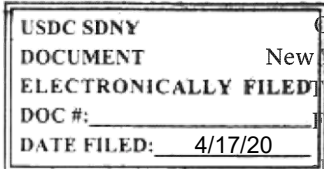


CLEARY GOTTlieb STEEN & HAMILTON LLP



One Liberty Plaza
New York, NY 10006-1470
+1 212 225 2000
+1 212 225 3999
clearygottlieb.com

WASHINGTON, D.C. • PARIS • BRUSSELS • LONDON • MOSCOW
FRANKFURT • COLOGNE • ROME • MILAN • HONG KONG
BEIJING • BUENOS AIRES • SÃO PAULO • ABU DHABI • SEOUL

D: +1 212-225-2490
jblackman@cgsh.com

SO ORDERED 4/17/20

Alison J. Nathan, U.S.D.J.

April 17, 2020

VIA ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007
nathannysdchambers@nysd.uscourts.gov

The Court hereby grants the parties' request.
SO ORDERED.

Re: *Doe et al v. U.S. Immigration and Customs Enforcement et al*,
No. 1:19-cv-08892-AJN

Dear Judge Nathan:

Pursuant to Rules 1.C and 1.D of the Court's Individual Practices in Civil Cases and Federal Rule of Civil Procedure 6(b)(1)(A), the parties in the above-captioned action jointly submit this letter-motion seeking the extension of two deadlines in the current Case Management Plan governing the above-captioned action (Dkt. Nos. 57-2, 62, 78) (the "Case Management Plan") and the adjournment of a post-discovery conference. The parties make this first request for an extension or adjournment in light of the Defendants' pending motion to dismiss (Dkt. No. 63) (the "Motion to Dismiss").

The parties respectfully request:

- 1) **An extension of the deadline to file any summary judgment or *Daubert* motion to thirty (30) days after the Court files an opinion on the Motion to Dismiss.** The current deadline for the parties to file any summary judgment or *Daubert* motion is 30

THOMAS J. MOLONEY	MARGARET S. PEONIS	HUGH C. CONROY, JR.
RICHARD S. LINDER	LISA M. SCHWEITZER	JOSEPH LANZKRON
JAMES A. DUNCAN	JUAN G. GIRALDEZ	MAURICE R. GINDI
STEVEN M. LOEB	DUANE MC LAUGHLIN	KATHERINE R. REAVES
CRAIG B. BROD	BREON S. PEACE	RAHUL MUKHI
NICOLAS GRABAR	CHANTALE E. KORDULA	ELANA S. BRONSON
CHRISTOPHER E. AUSTIN	BENET J. O'REILLY	MANUEL SILVA
HOWARD S. ZELBO	ADAM E. FLEISHER	KYLE A. HARRIS
DAVID E. BRODSKY	SEAN A. O'NEAL	LINA BENSMAN
ARTHUR H. KOHN	GLENN P. MCGRORY	ARON M. ZUCKERMAN
RICHARD J. COOPER	MATTHEW P. SALERNO	RESIDENT PARTNERS
JEFFREYS S. LEWIS	MICHAEL J. ALBANO	SANDRA M. ROCKS
PAUL J. SHIM	VICTOR L. HOU	JUDITH KASSEL
STEVEN L. WILNER	ROGER A. COOPER	PENELOPE L. CHRISTOPHOROU
ANDRES DE LA CRUZ	AMY R. SHAPIRO	BOAZ S. MORAG
DAVID C. LOPEZ	JENNIFER KENNEDY PARK	MARY E. ALCOCK
MICHAEL A. GERSTENZANG	ELIZABETH LENAS	HEIDE H. ILGENFRITZ
LEV L. DASSIN	LUKE A. BAREFOOT	KATHLEEN M. EMBERGER
NEIL Q. WHORISKEY	JONATHAN S. KOLODNER	AVRAM E. LUFT
JORGE U. JUANTORENA	DANIEL L. LAN	ANDREW WEAVER
MICHAEL D. WEINBERGER	MEYER H. FEDIDA	HELENA K. GRANNIS
DAVID LEINWAND	ADRIAN R. LEIPSIC	JOHN V. HARRISON
DIANA L. WOLLMAN	ELIZABETH VICENS	CAROLINE F. HAYDAY
JEFFREY A. ROSENTHAL	ADAM J. BRENNEMAN	NEIL R. MARKEL
MICHAEL D. DAYAN	ARI D. MACKINNON	KENNETH S. BLAZEJEWSKI
CARMINE D. BOCCUZZI, JR.	JAMES E. LANGSTON	LAURA BAGARELLA
JEFFREY D. KARPFF	JARED GERBER	SHIRLEY M. LO
KIMBERLY BROWN BLACKLOW	COLIN D. LLOYD	JONATHAN D.W. GIFFORD
ROBERT J. RAYMOND	COREY M. GOODMAN	SUSANNA E. PARKER
SUNG K. KANG	RISHI ZUTSHI	DAVID W.S. YUDIN
SANDRA L. FLOW	JANE VANLARE	RESIDENT COUNSEL
FRANCISCO L. CESTERO	DAVID H. HERRINGTON	LOUISE M. PARENT
FRANCESCA L. ODELL	KIMBERLY R. SPOERRI	OF COUNSEL
WILLIAM J. MCRAE	AARON J. MEYERS	
JASON FACTOR	DANIEL C. REYNOLDS	
JOON H. KIM	ABENA A. MAINOO	

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days after the close of discovery.¹ *See* Case Management Plan ¶ 13. Discovery in this action closed on April 1, 2020. *See id.* ¶ 7.

- 2) **An extension of the deadline for the parties to file a Joint Pretrial Report to the later of: forty-five (45) days after the Court files an opinion on the Motion to Dismiss, or fourteen (14) days after the Court files an opinion on any summary judgment motion that may be filed in this action.** The current deadline for the parties to file a Joint Pretrial Report is 40 days after the close of discovery, or, if a dispositive motion has been filed, within 14 days of a decision on such motion. *See id.* ¶ 14. Discovery in this action closed on April 1, 2020. *See id.* ¶ 7.
- 3) **An adjournment of the post-discovery conference currently scheduled for April 23, 2020 (Dkt. No. 90) to a date following the Court's opinion on the Motion to Dismiss.** Within one week after the Court files its opinion, the parties will provide the Court with three mutually agreeable alternate conference dates; the alternate dates will be earlier than the deadline to file any summary judgment motion.

The parties submit this joint request to enable them to brief any summary judgment motion or prepare for trial with the benefit of the Court's opinion on the Motion to Dismiss and respectfully request that the Court grant this letter-motion.

Respectfully submitted,

/s/ Jonathan I. Blackman

Jonathan I. Blackman

CLEARY GOTTlieb STEEN & HAMILTON LLP

cc: Rebecca Friedman, Tomoko Onozawa, *Counsel for Defendants*
Lilia Toson, Legal Aid Society, *Co-Counsel*

¹ The parties of course recognize Rule 3.G.vii of the Court's Individual Practices in Civil Cases, which provides the Court's general "good cause" requirement for summary judgment in non-jury cases.